

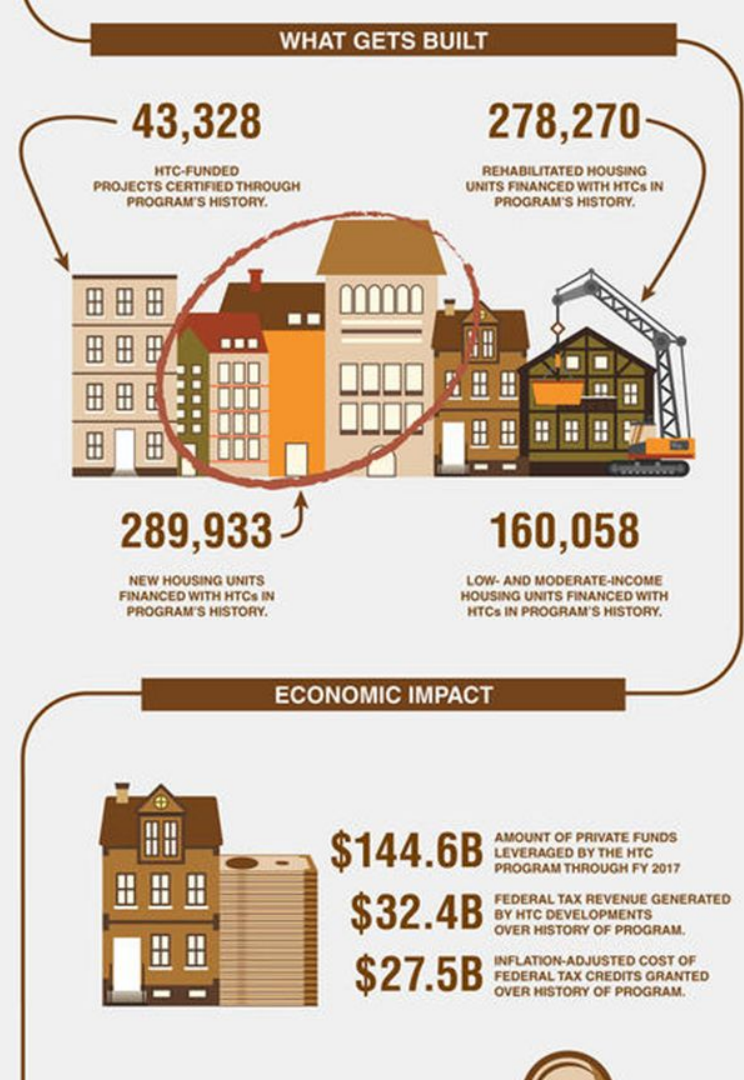
Historic Tax Credits

Assistance through the process

Historic Tax Credit by the Numbers

2018 numbers borrowed from Novogradac, a firm that does HTC and other TC consulting and research

<https://www.novoco.com/periodicals/articles/historic-tax-credits>
-2020



Basically credit pays for itself x 4

ECONOMIC IMPACT



\$144.6B AMOUNT OF PRIVATE FUNDS
LEVERAGED BY THE HTC
PROGRAM THROUGH FY 2017

\$32.4B FEDERAL TAX REVENUE GENERATED
BY HTC DEVELOPMENTS
OVER HISTORY OF PROGRAM.

\$27.5B INFLATION-ADJUSTED COST OF
FEDERAL TAX CREDITS GRANTED
OVER HISTORY OF PROGRAM.



\$4 AMOUNT OF PRIVATE INVESTMENT
LEVERAGED FOR EACH
DOLLAR OF TAX CREDITS.

\$2.10 ECONOMIC ACTIVITY CATALYZED
FOR EVERY \$1 IN HISTORIC
PROPERTY INVESTMENT.

0.79% RECAPTURE RATE FOR
FEDERAL HISTORIC TAX
CREDITS FOR 2000-2010.

2.54M

ESTIMATED JOBS CREATED BY
HTC DEVELOPMENTS
IN HISTORY OF PROGRAM.



106,846

ESTIMATED JOBS CREATED
BY HTC PROJECTS IN FY 2017.

WIDESPREAD, BENEFICIAL

Used
nationwide on a
variety of
projects

ESTIMATED JOBS CREATED BY
HTC DEVELOPMENTS
IN HISTORY OF PROGRAM.

ESTIMATED JOBS CREATED
BY HTC PROJECTS IN FY 2017.

WIDESPREAD, BENEFICIAL



OF HTC DEVELOPMENTS IN
FY 2017 THAT WERE \$1 MILLION
OR LESS IN CREDIT GENERATION.



OF HTC DEVELOPMENTS
SINCE 2002 THAT ARE IN
LOW-MODERATE-INCOME CENSUS TRACTS.

Dispel the Perception Problem

Perception HTC requires museum style restoration

“There can be concern regarding potential design limitations. **This concern is more perception than reality.** NPS, which is responsible for reviewing and approving HTC work, is primarily focused on the **preservation/treatment of historic material and the aesthetic compatibility of renovation design and new construction.** Typically, the more visible an element on a building, the greater the scrutiny by NPS.”

Quotes taken from “Historic Tax Credits 2020” by real estate expert John M. Tess of Novogradac



Try to help us think like developers and investors!

Reality Lots of Design Opportunities

Vibrant New Uses

“For example, exterior and public space treatments are more important to the NPS than remote interior spaces. Ironically, although the installation of new systems (e.g., mechanical, plumbing, electricity, telecommunications, and fire and life safety) are often hefty budget items, within limited parameters (such as whether ducting is exposed or buried) **NPS review tends to take a light hand in this realm.**”



Dispel the Perception Problem

HTC can preserve very important landmark buildings and give important new uses

The owners of the 1949 McKissack & McKissack designed Universal Life Insurance building in Memphis used HTC to rehabilitate the building in an area **prime for high-rise redevelopment.**



Dispel the Perception Problem

Perception HTC requires museum style restoration

The rehabilitation design honored the buildings history by maintaining the overall office plan, and restoring original details like doors, floors, and wrought iron stair handrails but allowed for open offices and green features.



View of the updated former clerical pool space



View of the second floor lobby

Dispel the Perception Problem

Perception HTC requires museum style restoration

All while following the *Standards*, the design incorporated energy efficient systems, recycled products, and waste reduction practices that qualify it for LEED certification.



Dispel the Perception Problem

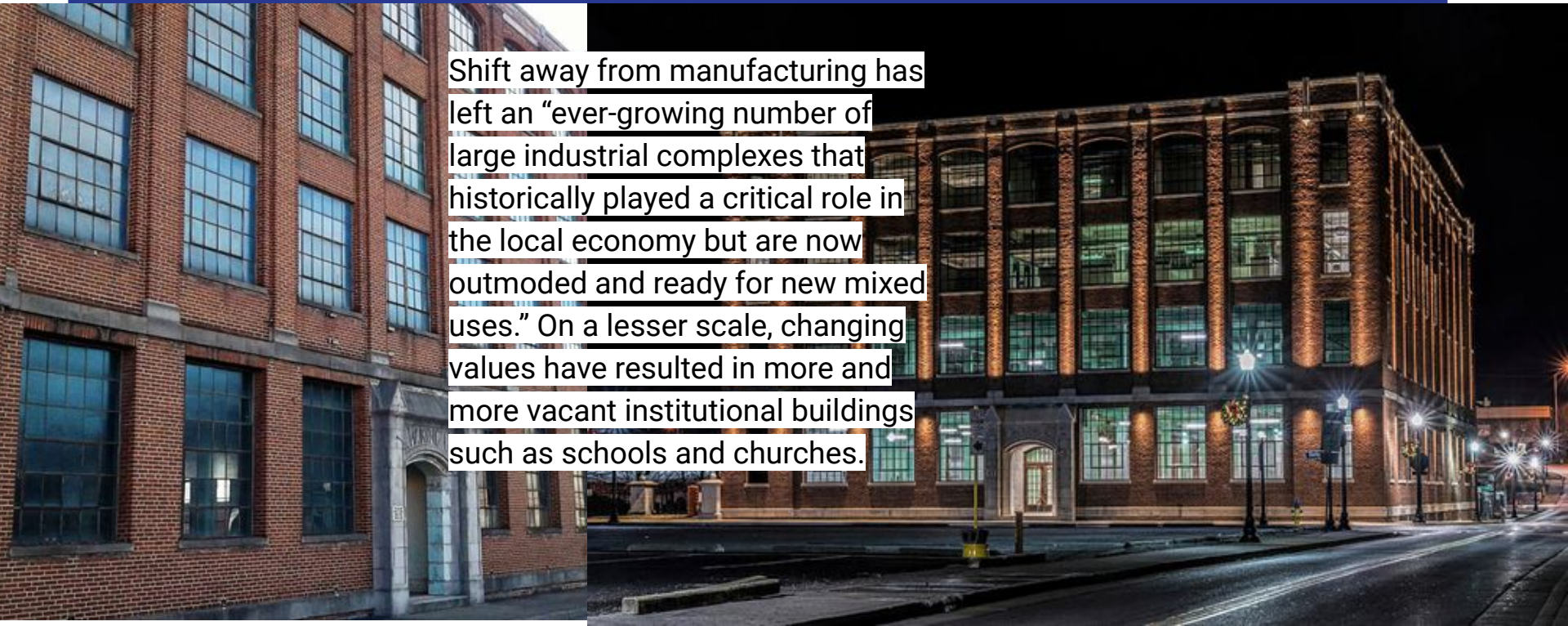
Perception HTC requires museum style restoration

The building will serve as office space for owner Self Tucker Architects with the City of Memphis's new Entrepreneurs Network Center, as primary tenant. **The rehabilitation has brought renewed life and energy to a building that was vacant and endangered for eighteen years.**



Mill or Factory Buildings Still Make Great Projects

More from Mr. Tess...



Shift away from manufacturing has left an “ever-growing number of large industrial complexes that historically played a critical role in the local economy but are now outmoded and ready for new mixed uses.” On a lesser scale, changing values have resulted in more and more vacant institutional buildings such as schools and churches.

Mill or Factory Buildings Still Make Great Projects

Recent Example

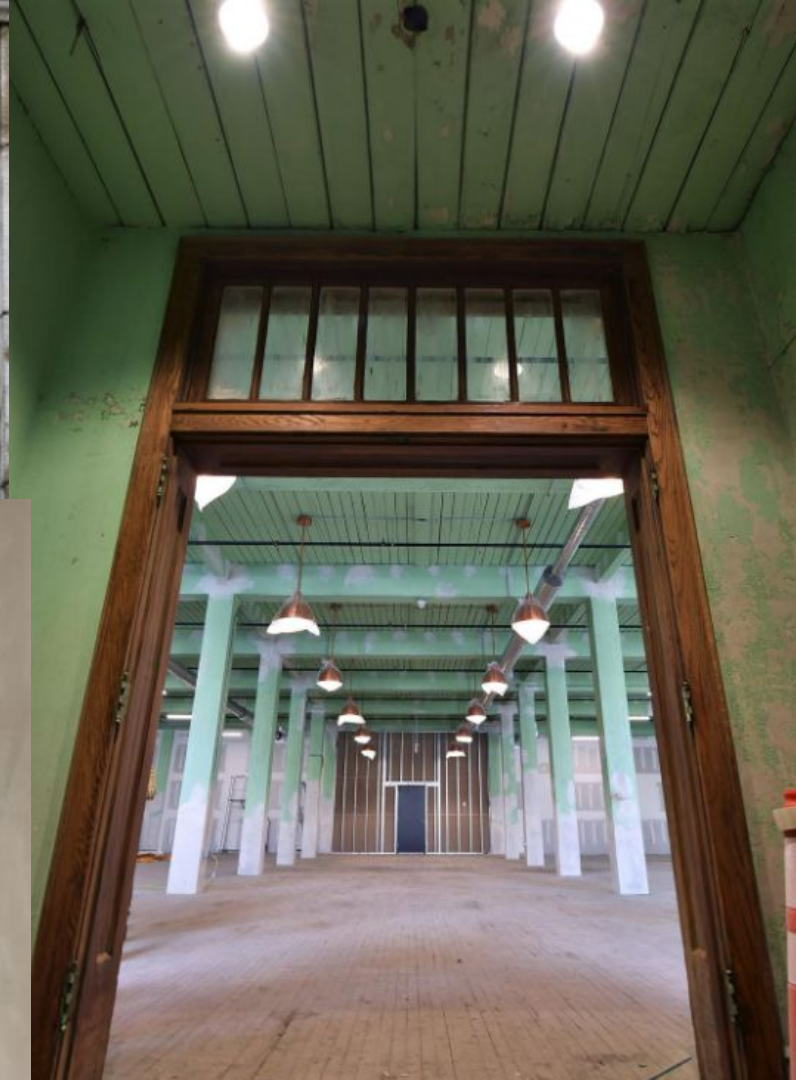


E.W. King building--now home to the Bristol Renaissance Center and is home to various offices including Deloitte, a professional services company.





The restoration itself was thought to have created at least 25 jobs.



Catalyst for new growth in Bristol

According to Tracy Mumpower, a Deloitte spokesperson, “Almost all of the people who work in our office are from the Bristol area...to be able to stay in Bristol in a professional-level job...is absolutely amazing.”

Deloitte currently has fifty employees but has plans to expand within the King Building space.



Tax Credit Language can be different from NR language

“certified historic
structure”

A **certified historic structure** is defined as a building that is

- **listed in the National Register of Historic Places**, either
 - individually or
 - as a contributing building in a National Register historic district,
- Only a certified historic structures qualify for the credits. The “structure” must be a building—not a bridge, ship, or a railroad car, for example.

“rehabilitation”

"**Rehabilitation**" is defined in the regulations (36 CFR Part 67) as:

*The **process of returning a building or buildings to a state of utility**, through repair or alteration, which makes possible an efficient use while **preserving those portions and features of the building and its site and environment which are significant** to its historic, architectural, and cultural values.*

Rehabilitation not only encourages the repair of historic buildings, it **allows appropriate alterations to ensure their efficient contemporary use**. Examples include the continued use of hotels, stores, and private residences, as well as the adaptation of vacant schools into apartments, warehouses into offices, and industrial buildings into commercial space.

From NPS

“historic character”

Historic buildings are physical records of past inhabitants. People make changes to buildings over time to fit new uses and needs. The **historic character** results from the **combination of the character-defining features that have established the appearance of the building as it has evolved over time.**

Character-defining aspects of the building that need to be identified and evaluated may include **form and detailing of exterior materials, exterior features such as roofs, porches, and windows; materials, such as plaster and wood; finished and unfinished interior spaces; and interior features, such as moldings and stairways, room configuration, and spatial relationships, as well as structural systems.**

“Certified rehabilitation”

The National Park Service must approve, or “certify” all rehabilitation projects seeking the 20% tax credit. A **certified rehabilitation** is a rehabilitation of a **certified historic structure** that is approved by the NPS as being consistent with the **historic character** of the property and, where applicable, the district in which it is located.

From NPS

“Substantial rehabilitation test”

The project must meet the "substantial rehabilitation test." In brief, this means that the cost of rehabilitation must exceed the pre-rehabilitation cost of the building. Generally, this test must be met within two years or within five years for a project completed in multiple phases.

The cost of a project must exceed the greater of \$5,000 or the building's adjusted basis. The following formula will help you determine if your project will be substantial:

- $A - B - C + D = \text{adjusted basis}$
- A = purchase price of the property (building and land)
- B = the cost of the land at the time of purchase
- C = depreciation taken for an income-producing property
- D = cost of any capital improvements made since purchase

If the owner has a question about this, they should consult a tax accountant!

<https://www.nps.gov/tps/tax-incentives/before-apply/eligibility-requirements.htm>

“QRE” Qualified rehabilitation expenses

Not every expense associated with a rehabilitation project contributes toward the calculations for the 20% rehabilitation tax credit. In general, only those costs that are directly related to the repair or improvement of structural and architectural features of the historic building will qualify.

Costs associated with these items are generally eligible

- Walls
- Partitions
- Floors
- Ceilings
- Permanent coverings, such as paneling or tiles
- Windows and doors
- Components of central air conditioning or heating systems
- Plumbing and plumbing fixtures
- Electrical wiring and lighting fixtures
- Chimneys
- Stairs
- Escalators, elevators, sprinkler systems, fire escapes
- Other components related to the operation or maintenance of the building

Expenses that do not qualify for the rehabilitation tax credit

- Acquisition costs
- Appliances
- Cabinets
- Carpeting (if tacked in place and not glued)
- Decks (not part of original building)
- Demolition costs (removal of a building on property site)
- Fencing
- Feasibility studies

<https://www.nps.gov/tps/tax-incentives/before-apply/qualified-expenses.htm>

Process Overview

Part 1

Before

Needs an overview of what makes the building significant, architectural description of the building or buildings if a complex

Documents historic character

Part 2

Describe the *During*

Basically a project description of the rehab

- Form breaks down by type of work
- Amendment forms can document project changes

Documents HC will be retained

Part 3

After

Nothing written. Signed form requesting certification of rehab completed as done in the Part 2 and any Amendments, if needed

Lots of clear photos of the building post-rehab

Documents HC still there!

Part 1

Part 2

Part 3

Be sure you are using the New NPS Forms!

NPS Form 10-108 (Rev. 06/2014 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 – EVALUATION OF SIGNIFICANCE**

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in the application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. Property Name
 Street _____
 City _____ County _____ State _____ Zip _____
 Name of Historic District _____
☐ National Register district ☐ certified state or local district ☐ potential district

2. Nature of Request (check only one box)
☐ certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation purposes.
☐ certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.
☐ certification that the building does not contribute to the significance of the above-named district.
☐ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period of area of significance contributes to the significance of the district.

3. Project Contact (if different from applicant)
 Name _____ Company _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____

4. Applicant
 I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that (check one or both boxes, as applicable):
☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or
☐ I am not the sole owner of the above-described property, but the sole owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if either is attached to this application form and incorporated herein, or has been previously submitted, and it meets the requirements of 36 CFR § 67.3(a)(1) (2011).
 For purposes of this attestation, the singular shall include the plural whenever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.

Name _____ Signature (sign in ink) _____ Date _____
 Applicant Entity _____ SSN _____ or TIN _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____

NPS Official Use Only
 The National Park Service has reviewed the Historic Preservation Certification Application – Part 1 for the above-named property and has determined that the property:
☐ contributes to the significance of the above-named district or National Register property and is a "verified historic structure" for rehabilitation purposes.
☐ contributes to the significance of the above-named district and is a "verified historic structure" for a charitable contribution for conservation purposes.
☐ does not contribute to the significance of the above-named district.

Reversal Determinations:
☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, which will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Officer.
☐ appears to contribute to the significance of a registered historic district the period of area of significance as documented in the National Register nomination or district documentation on file with the NPS as established by the State Historic Preservation Officer.
☐ does not appear to qualify as a verified historic structure.

Date _____ National Park Service Authorized Signature (sign in ink) _____
☐ NPS Comments Attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (Item 1.A.2)(ii)-(iv)-(v))

NPS Form 10-108a (Rev. 06/2014 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION**

Instructions: This page must bear the applicant's original signature and must be dated. The National Park Service certification decision is based on the descriptions in this application form. In the event of any discrepancy between the application form and other, supplementary material submitted with it (such as architectural plans, drawings and specifications), the application form takes precedence. A copy of this form will be provided to the Internal Revenue Service.

1. Property Name
 Street _____ City _____ County _____ State _____ Zip _____
 Name of Historic District _____
☐ Listed individually in the National Register of Historic Places, date of listing _____
☐ Located in a Registered Historic District, name of district _____
☐ Part 1 – Evaluation of Significance submitted? _____ Date submitted _____ Date of certification _____

2. Project Data
 Date of building _____ Estimated rehabilitation costs (CPI) _____
 Number of buildings in project _____ Floor area before / after rehabilitation _____ sq ft
 Start date (estimated) _____ Units before / after rehabilitation _____ / _____
 Completion date (estimated) _____ Number of housing units before / after rehabilitation _____ / _____
 Number of projects in project _____ Number of low/moderate housing units before / after rehabilitation _____ / _____

3. Project Contact (if different from applicant)
 Name _____ Company _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____

4. Applicant
 I hereby attest that the information I have provided is, to the best of my knowledge, correct. I further attest that (check one or both boxes, as applicable):
☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or
☐ I am not the sole owner of the above-described property, but the sole owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if either is attached to this application form and incorporated herein, or has been previously submitted, and it meets the requirements of 36 CFR § 67.3(a)(1) (2011).
 For purposes of this attestation, the singular shall include the plural whenever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.

Name _____ Signature (sign in ink) _____ Date _____
 Applicant Entity _____ SSN _____ or TIN _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only
 The National Park Service has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property and has determined that:
☐ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This letter is a preliminary determination only, while a formal certification of rehabilitation can be issued only to the owner of a "verified historic structure" after rehabilitation work is complete.
☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's standards for Rehabilitation if the attached conditions are met.
☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date _____ National Park Service Authorized Signature (sign in ink) _____
☐ NPS conditions or comments attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (Item 1.A.2)(ii)-(iv)-(v))

NPS Form 10-108b (Rev. 06/2014 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 3 – REQUEST FOR CERTIFICATION OF COMPLETED WORK**

Instructions: This page must bear the applicant's original signature and must be dated.

1. Property Name
 Street _____ City _____ County _____ State _____ Zip _____
 Name of Historic District _____
☐ is properly a verified historic structure? ☐ Yes ☐ No If yes, date of NPS certification _____ OR date of National Register listing _____

2. Project Data
 Project start date _____ Project completed and building placed in service date _____
 Estimated rehabilitation costs (CPI) _____ Total estimated costs (CPI plus non-CPI) _____
 Number of housing units before/after rehabilitation _____ / _____ Number of low/moderate housing units before/after rehabilitation _____ / _____

3. Project Contact (if different from applicant)
 Name _____ Company _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____

4. Applicant (I, the undersigned, am not the owner)
 I hereby attest that the information I have provided is, to the best of my knowledge, correct and that I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011). For purposes of this attestation, the singular shall include the plural whenever appropriate. I understand that knowing and willful falsification of factual representations in this application may subject me to fines and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.
☐ I am not the sole owner of the above-described property, but the sole owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if either is attached to this application form and incorporated herein, or has been previously submitted, and it meets the requirements of 36 CFR § 67.3(a)(1) (2011).
☐ There are no additional owners within the meaning of "owner" set forth in 36 CFR § 67.2 (2011).

Name _____ Signature (sign in ink) _____ Date _____
 Applicant Entity _____ SSN _____ or TIN _____
 Street _____ City _____ State _____
 Zip _____ Telephone _____ Email Address _____

NPS Official Use Only
 The National Park Service has reviewed the Historic Preservation Certification Application – Request for Certification of Completed Work (Part 3) for this property and has determined that:
☐ the completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation and is consistent with the historic character of the property and, where applicable, the district in which it is located. Effective the date indicated below, the rehabilitation of the "verified historic structure" is hereby designated a "verified rehabilitation." This certification is to be used in conjunction with appropriate Internal Revenue Service regulations. Questions concerning specific tax consequences or interpretations of the Internal Revenue Code should be addressed to the Internal Revenue Service. Completed projects may be inspected by an authorized representative of the Secretary of the Interior to determine if the work meets the Secretary's Standards for Rehabilitation. The Secretary reserves the right to make inspections at any time up to the year of completion of the rehabilitation and to make certification. If it is determined that the rehabilitation project was not undertaken as prescribed by the owner in the application form and supporting documentation, or the work, upon obtaining certification, undertaken unapproved further alterations to a part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.
☐ the rehabilitation is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.
 A copy of this determination will be provided to the Internal Revenue Service in accordance with Federal law.

Date _____ National Park Service Authorized Signature (sign in ink) _____
☐ NPS Comments Attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (Item 1.A.2)(ii)-(iv)-(v))

Part 1

Part 2

Part 3

Submit two "wet-signed" copies of forms to me

NPS Form 10-108 (Rev. 06/2016 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 1 – EVALUATION OF SIGNIFICANCE**

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1. Property Name
Street _____
City _____ County _____ State _____ Zip _____
☐ National Register district ☐ certified state or local district ☐ potential district

2. Nature of Request (check only one box)
☐ certification that the building contributes to the significance of the above-named historic district or National Register property for rehabilitation purposes.
☐ certification that the building contributes to the significance of the above-named historic district for a charitable contribution for conservation purposes.
☐ certification that the building does not contribute to the significance of the above-named district.
☐ preliminary determination for individual listing in the National Register.
☐ preliminary determination that a building located within a potential historic district contributes to the significance of the district.
☐ preliminary determination that a building outside the period or area of significance contributes to the significance of the district.

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant
(I/We certify that the information I have provided is, to the best of my knowledge, correct. I further affirm that (check one or both boxes, as applicable):
☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or
I am not the true owner of the above-described property, the true owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if other is attached to this application form and incorporated herein, or has been previously submitted, and (i) meets the requirements of 36 CFR § 67.3(a)(1) (2011).
For purposes of this application, the owner and I include the place where appropriate. Understand that knowing and willful falsification of factual representations in this application may subject me to fine and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.

Signature (Sign in Ink) _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Part 1 for the above-named property and has determined that the property:
☐ contributes to the significance of the above-named district or National Register property and is a "certified historic structure" for rehabilitation purposes.
☐ contributes to the significance of the above-named district and is a "potential historic structure" for a charitable contribution for conservation purposes.
☐ does not contribute to the significance of the above-named district.

Preliminary Determination:
☐ appears to meet the National Register Criteria for Evaluation and will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Office according to the procedures set forth in 36 CFR Part 60.
☐ does not appear to meet the National Register Criteria for Evaluation and will likely not be listed in the National Register.
☐ appears to contribute to the significance of a potential historic district, but will likely be listed in the National Register of Historic Places if nominated by the State Historic Preservation Office.
☐ appears to contribute to the significance of a regulated historic district if the period or area of significance as documented in the National Register nomination or district documentation or on which the NPS is regulated by the State Historic Preservation Office.
☐ does not appear to qualify as a certified historic structure.

Date _____ National Park Service Authorized Signature (Sign in Ink)
☐ NPS Comments Attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (RM 1A.2) (N-79-50-1).

NPS Form 10-108a (Rev. 06/2016 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 2 – DESCRIPTION OF REHABILITATION**

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1. Property Name
Street _____
City _____ County _____ State _____ Zip _____
Name of Historic District _____
☐ Listed individually in the National Register of Historic Places, date of listing _____
☐ Located in a Registered Historic District, name of district _____
Part 1 – Evaluation of Significance submitted _____ Date submitted _____ Date of certification _____

2. Project Data
Date of building _____ Estimated rehabilitation costs (CPIE) _____
Number of buildings in project _____ Floor area before / after rehabilitation _____ sq ft
Start date (estimated) _____ Weeks before / after rehabilitation _____
Completion date (estimated) _____ Number of housing units before / after rehabilitation _____
Number of phases in project _____ Number of moderate income housing units before / after rehabilitation _____

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant
(I/We certify that the information I have provided is, to the best of my knowledge, correct. I further affirm that (check one or both boxes, as applicable):
☐ I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011), and/or
I am not the true owner of the above-described property, the true owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if other is attached to this application form and incorporated herein, or has been previously submitted, and (i) meets the requirements of 36 CFR § 67.3(a)(1) (2011).
For purposes of this application, the owner and I include the place where appropriate. Understand that knowing and willful falsification of factual representations in this application may subject me to fine and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years.

Signature (Sign in Ink) _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____
☐ Applicant, SSN, or TIN has changed since previously submitted application.

NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Part 2 for the above-named property and has determined that:
☐ the rehabilitation described herein is consistent with the historic character of the property and, where applicable, with the district in which it is located and that the project meets the Secretary of the Interior's Standards for Rehabilitation. This is a preliminary determination only; a formal certification of rehabilitation can be issued only to the owner of a "certified historic structure" after rehabilitation work is complete.
☐ the rehabilitation or proposed rehabilitation will meet the Secretary of the Interior's Standards for Rehabilitation if the attached conditions are met.
☐ the rehabilitation described herein is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

Date _____ National Park Service Authorized Signature (Sign in Ink)
☐ NPS Comments Attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (RM 1A.2) (N-79-50-1).

NPS Form 10-108b (Rev. 06/2016 v2)
National Park Service

OMB Control No. 1024-0009

**HISTORIC PRESERVATION CERTIFICATION APPLICATION
PART 3 – REQUEST FOR CERTIFICATION OF COMPLETED WORK**

Instructions: This page must bear the applicant's original signature and must be dated.

1. Property Name
Street _____
City _____ County _____ State _____ Zip _____
Is property a certified historic structure? ☐ Yes ☐ No If yes, date of NPS certification _____ OR date of National Register listing _____

2. Project Data
Project start date _____ Project completed and building placed in service date _____
Estimated rehabilitation costs (CPIE) _____ Total estimated costs (CPIE plus non-CPIE) _____
Number of housing units before/after rehabilitation _____ / _____ Number of moderate income housing units before/after rehabilitation _____ / _____

3. Project Contact (if different from applicant)
Name _____ Company _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

4. Applicant (List all additional owners on next page.)
(I/We certify that the information I have provided is, to the best of my knowledge, correct and that I am the owner of the above-described property within the meaning of "owner" set forth in 36 CFR § 67.2 (2011). For purposes of this application, the owner and I include the place where appropriate. Understand that knowing and willful falsification of factual representations in this application may subject me to fine and imprisonment under 18 U.S.C. § 1001, which, under certain circumstances, provides for imprisonment of up to 5 years. Additionally:
☐ I am not the true owner of the above-described property, I have checked this box to attest that the true owner is aware of the action I am taking relative to this application and has no objection, as noted in a written statement from the owner, a copy of which (if other is attached to this application form and incorporated herein, or has been previously submitted, and (i) meets the requirements of 36 CFR § 67.3(a)(1) (2011).
☐ Applicant, SSN, or TIN has changed since previously submitted application.
☐ There are no additional owners within the meaning of "owner" set forth in 36 CFR § 67.2 (2011).

Signature (Sign in Ink) _____ Date _____
Applicant Entity _____ SSN _____ or TIN _____
Street _____ City _____ State _____
Zip _____ Telephone _____ Email Address _____

NPS Official Use Only
The National Park Service has reviewed the Historic Preservation Certification Application – Request for Certification of Completed Work (Part 3) for this property and has determined that:
☐ the completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation and is consistent with the historic character of the property and, where applicable, the district in which it is located. Therefore, the date listed below, the rehabilitation of the "certified historic structure" on the date of the rehabilitation. This certification is to be used in conjunction with appropriate Internal Revenue Service regulations. Questions concerning specific tax consequences or interpretation of the Internal Revenue Code should be addressed to the Internal Revenue Service. Questions concerning specific tax consequences of the Secretary to determine if the work meets the standards for rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to require verification. If it is determined that the rehabilitation project was not undertaken as prescribed by the date of the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.
☐ the completed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation. However, because this property is not yet a "certified historic structure," the rehabilitation cannot be designated a "certified historic structure" eligible for historic tax credits at this time. If and when a "certified historic structure" on the date of the rehabilitation, the date in which it is located is listed in the National Register of Historic Places. On that date, the completed rehabilitation will automatically become a "certified historic structure." The owner's responsibility to obtain historic tax credits through the State Historic Preservation Office. Questions concerning specific tax consequences of the Secretary to determine if the work meets the standards for rehabilitation. The Secretary reserves the right to make inspections at any time up to five years after completion of the rehabilitation and to require verification. If it is determined that the rehabilitation project was not undertaken as prescribed by the date of the application form and supporting documentation, or the owner, upon obtaining certification, undertook unapproved further alterations as part of the rehabilitation project inconsistent with the Secretary's Standards for Rehabilitation.
☐ the rehabilitation is not consistent with the historic character of the property or the district in which it is located and that the project does not meet the Secretary of the Interior's Standards for Rehabilitation.

A copy of this determination will be provided to the Internal Revenue Service in accordance with Federal law.

Date _____ National Park Service Authorized Signature (Sign in Ink)
☐ NPS Comments Attached

RECORDS RETENTION - PERMANENT: Transfer all permanent records to NARA 15 years after closure. (NPS Records Schedule, Resource Management and Lands (RM 1A.2) (N-79-50-1).

Part 1

Part 2

Part 3

Evaluation of Significance

Take good photos!

Do not need a photo of every single inch of the building for the Part 1.

Do need overviews of main spaces, character defining features, and representative views of offices/apartments if similar.

Part 1

Part 2

Part 3

For Parts 1-3

Just because you took the photo doesn't mean you have to use it. Don't include it if it is:

- blurry,
- repeats the same area,
- or isn't a character defining feature

Paring down photos means less you have to label and key.



Part 1

Part 2

Part 3

Photos cannot be submitted digitally...to NPS.

NPS Requirement! I will have to send it back if you do not include printed photos.

Photos must be submitted on photo paper.

- Regular (Crisp and Clear) 4X6 type prints are fine.
- Regular copy paper is not allowed.
- Must be labeled on the back of the photo



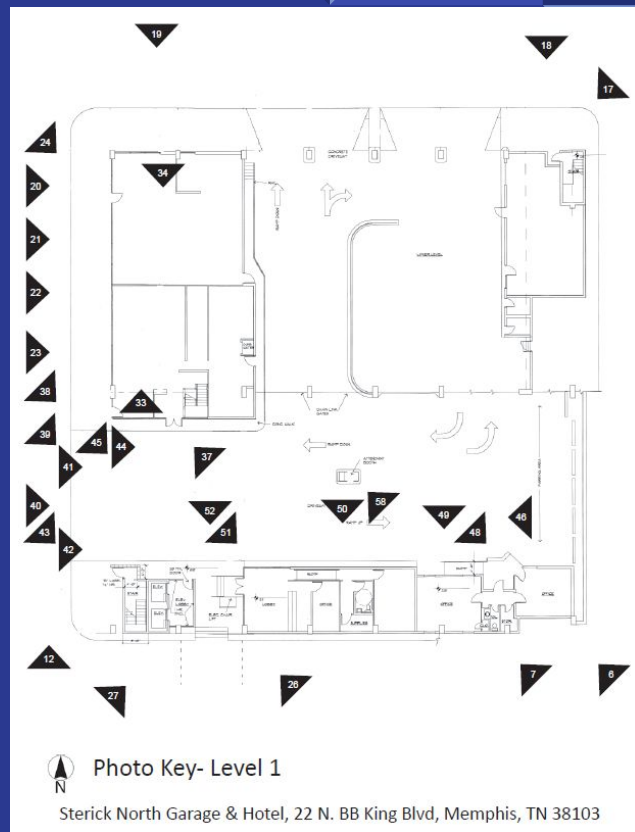
Part 1

Part 2

Part 3

Make sure you have
a clear **photo key**,
site plan, and **floor**
plans

NPS Requirement! It doesn't have
to be architectural renderings, but I will
have to send it back if you do not include
these things.



Part 1

Part 2

Part 3

If property is **Contributing** within a HD, provide

- The info from the NR
- An updated architectural description, both interior and exterior
- Explain any changes from when it was listed.



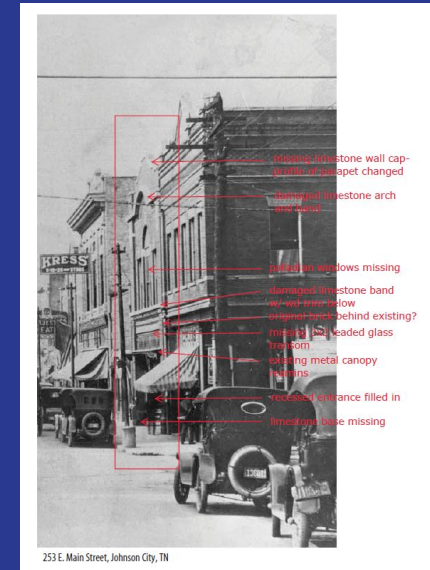
Part 1

Part 2

Part 3

If property is **Non-Contributing within a HD** but sufficient changes have occurred that it would now be contributing, provide

- the info from the NR
- an updated architectural description, both interior and exterior
- Explain any changes from when it was listed and why it should now be contributing
- Note the POS and how it would fit with it



Part 1

Part 2

Part 3

Submit two copies of everything to SHPO for review. SHPO will submit to NPS.

If they have any comments they will let us know but eventually, in most cases,

NPS certifies your building!

Part 2

Description of Rehabilitation



Part 1

Part 2

Part 3

Describe the Rehab

P2 also requires Plans and Overall Site Plan

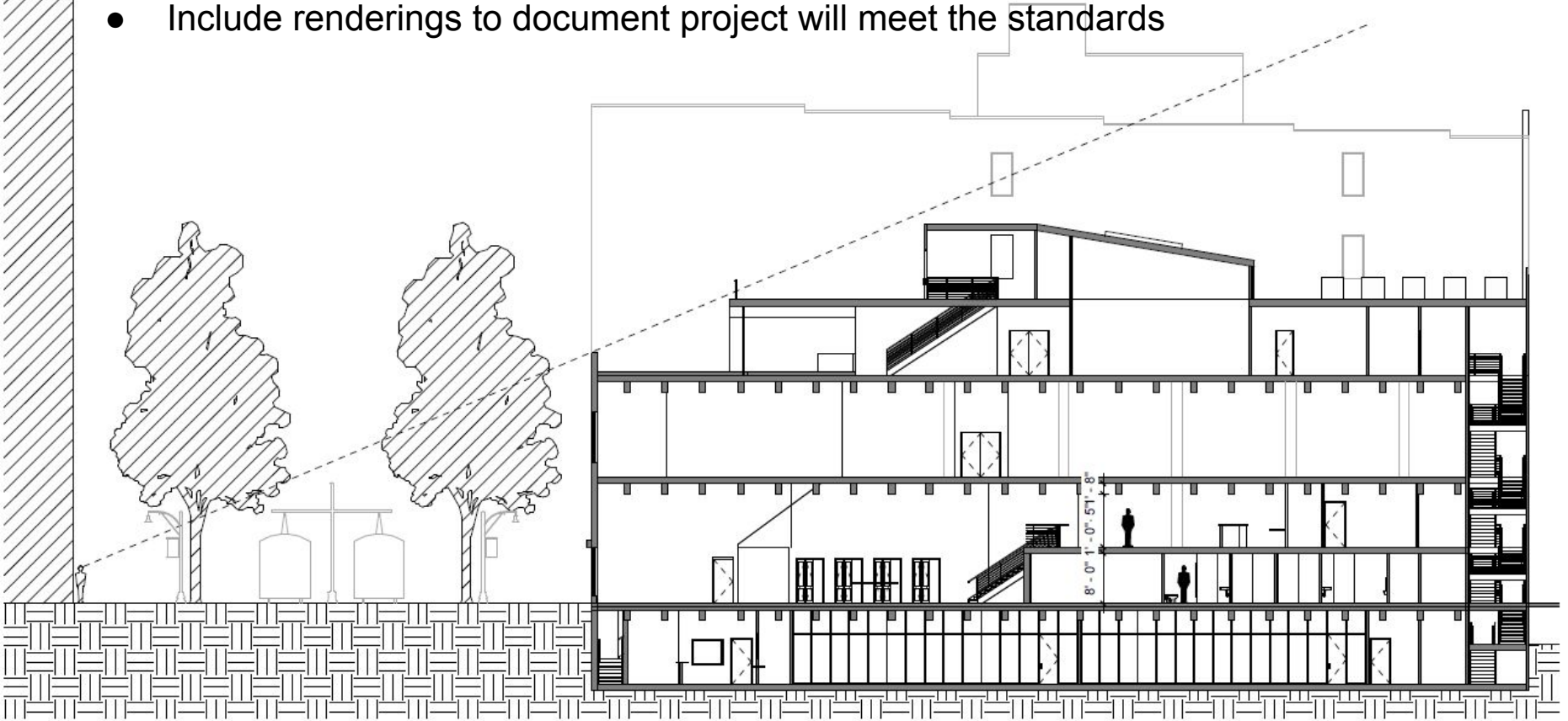
1. Maple and heart pine wood Floors
2. Glass block windows
3. Clearstory Windows
4. Metal Shipping Shed/Structure
5. Water Tower
6. Caustic Tanks and Concrete Structure
7. Main building concrete exterior
8. South facade garage door
9. Central Courtyard
10. South facade 2nd floor entrance
11. Elevators and elevator shafts
12. Cooling pond
13. Concrete flooring
14. Steel connection
15. Historic exterior doors
16. Building code compliance
17. Interior structural systems
18. Mercerizing & Dye room
19. Cafeteria
20. Machine shop
21. Boiler building and smokestack
22. Main entrance stairwell
23. Winding room
24. Courtyard
25. Post 1955 brick addition
26. Roof covering
27. Mechanical, electrical, plumbing



Form must include a clear and concise project description of the rehab

- Form breaks down by type of work
- Work must meet all of the *Secretary of the Interior's Standards for Rehabilitation*
- Be clear about where work will not be happening (if a single large building or complex)
- Document what will happen to the entire property (landscaping features, parking lots, etc)

- Explain major changes in more detail
- Include renderings to document project will meet the standards



Part 1

Part 2

Part 3

P2 Can Need More Photos Than P1

Make sure the labels are clear and descriptive

Photo #1

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NW

Description: Exterior showing North and West façades

11/14/19

Photo #3

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NE

Description: Exterior showing North façade

11/14/19

Photo #2

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from SW

Description: Exterior showing West façade

11/14/19

Photo #4

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NE

Description: Exterior showing lower Levels of North and East
façades

11/14/19

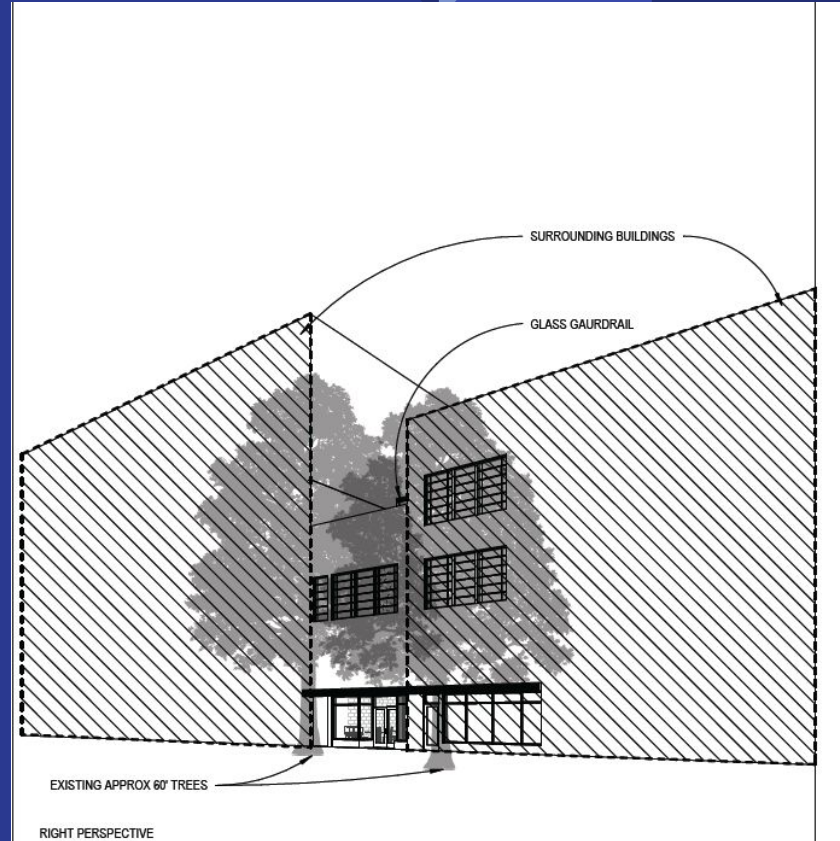
Part 1

Part 2

Part 3

Needs Clear Plans

Make sure you have documented the building with photos, site plans, and floor plans every where work is proposed....and again photos are keyed to site plan/floor plans.



Part 1

Part 2

Part 3

Submit two copies of everything to SHPO for review. SHPO will submit to NPS. NPS will contact the owner to pay the fee before they begin their review. More info about the fee is [here](#).

If they have any comments they will let us know but eventually, in most cases,

*NPS approves
your rehabilitation!*

**Begin the
Rehabilitation**

Part 1

Part 2

Part 3

Things come up.

- Amendment form can document project changes
- Easy form
- Also needs plans, renderings, etc. to document proposed changes from Part 2

But when construction is complete, the building it has been “placed into service,” and is listed in the National Register...you are ready for the Part 3!

Part 3 is the Request for Certification of Completed Work

Part 1

Part 2

Part 3

P3 is relatively simple. The After.

Part 3 is the Request for Certification of Completed Work

Our office and NPS will evaluate the completed project and compares it with the work proposed in the Part 2 application form.

If it meets the Standards, the National Park Service approves the project as a certified rehabilitation eligible for the 20% rehabilitation tax credit.

Photo #1

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103
View: Exterior from NW
Description: Exterior showing North and West façades
11/14/19

Photo #2

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103
View: Exterior from SW
Description: Exterior showing West façade
11/14/19

Photo #3

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103
View: Exterior from NE
Description: Exterior showing North façade
11/14/19

Photo #4

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103
View: Exterior from NE
Description: Exterior showing lower levels of North and East façades
11/14/19

Part 1

Part 2

Part 3

P3 is essentially photos.

Helpful to take same photos as P2.

- Can reuse the photo keys and labels!
- Easy to see rehab as before and after.

Photo #1

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NW

Description: Exterior showing North and West façades

11/14/19

Photo #3

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NE

Description: Exterior showing North façade

11/14/19

Photo #2

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from SW

Description: Exterior showing West façade

11/14/19

Photo #4

Sterick North, 22 N. BB King Blvd, Memphis, TN 38103

View: Exterior from NE

Description: Exterior showing lower Levels of North and East façades

11/14/19



Photo 21 Universal Life Insurance Company 7/31/15
View from the rear entrance door looking along the central axial corridor to the front door.



Photo 21 Universal Life Insurance Company 1/31/19
View from the rear entrance door looking along the central axial corridor to the front door.



Photo 24 Universal Life Insurance Company 7/31/15
View of the second floor public lobby, looking towards the stair to the first floor.

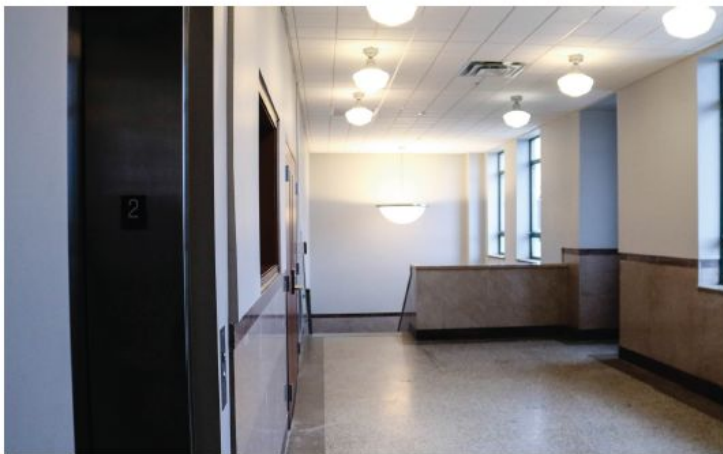


Photo 24 Universal Life Insurance Company 1/31/19
View of the second floor public lobby, looking towards the stair to the first floor.

Part 3 Photos

Part 1

Part 2

Part 3

Submit two copies to SHPO for review and SHPO submission to NPS.

If they have any comments they will let us know but eventually, in most cases,

*NPS certifies your
rehabilitation!*

Part 1

Part 2

Part 3

Once the Part 3 is Certified...

The owner can claim the credit...The End*

***Unless, the owner does anything rehab or ownership related in the next five years, plans will need to be submitted to our office to send to NPS for review on an Amendment form.**



Part 1

More Information

THC-Federal Historic
Tax Credit Program

NPS-Tax
Incentives—Technical
Preservation Services

Novogradac About the
Historic Tax Credit

Part 2

Part 3

Holly Barnett
holly.m.barnett@tn.gov
615.770.1098

Historic Tax Credit Program
State Historic Preservation
Office
Clover Bottom Mansion
2941 Lebanon Pike
Nashville, TN 37214